

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

\_\_\_\_\_  
In re:

CII PARENT INC.,

Debtor.<sup>1</sup>  
\_\_\_\_\_

)  
)  
)  
)  
)  
)  
)

Chapter 11

Case No. 22-11345 (LSS)

**DEBTOR’S RULE 30(B)(6) NOTICE TO TWIN BROOK**

**PLEASE TAKE NOTICE** that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and in connection with its *Motion for Entry of an Order Enforcing the Automatic Stay and Granting Related Relief* [Docket No. 12], the above-captioned debtor and debtor in possession (the “Debtor”), by its attorneys Glenn Agre Bergman & Fuentes LLP, will take the deposition upon oral examination of Twin Brook Capital Partners, LLC (“Twin Brook Capital Partners”) and certain Twin Brook Capital Partners affiliated entities (together with Twin Brook Capital Partners, “Twin Brook”) through one or more officers, directors, agents, or other representatives who shall be designated to testify on Twin Brook’s behalf regarding all information known or reasonably available to Twin Brook with respect to the subject matters identified in **Exhibit A**. The Debtor requests that Twin Brook provide written notice at least five (5) business days before the deposition of the name(s) and employment position(s) of the individual(s) designated to testify on Twin Brook’s behalf.

The deposition will commence on February 7, 2023 at 9:30 a.m. (E.T.), at the offices of Glenn Agre Bergman & Fuentes LLP, 1185 Avenue of the Americas, 22nd Floor, New York, New York 10036, or at another date, time, or location otherwise agreed to by the parties. The deposition

<sup>1</sup> The last four digits of Debtor CII Parent, Inc.’s tax identification number are 4706. The location of the Debtor’s service address for purposes of this chapter 11 case is 21 Custom House Street, Boston, Massachusetts 02110.

will be taken before a notary public or other officer authorized by law to administer oaths, and will be recorded by audio, visual, or stenographic means. This deposition may be taken using a secure web-based deposition platform, by video conferencing services, and/or telephonically, with all parties, including the court reporter, in separate locations, as permitted by Rule 30(b)(4) of the Federal Rules of Civil Procedure.

*[Signature Page Follows]*

Dated: January 20, 2023  
Wilmington, Delaware

/s/ Robert J. Dehney

Robert J. Dehney (No. 3578)

Daniel Butz (No. 4227)

Brian Loughnane (No. 6853)

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

1201 North Market Street, 16th Floor

P.O. Box 1347

Wilmington, Delaware 19899-1347

Telephone: (302) 658-9200

Facsimile: (302) 658-3989

Email: rdehney@morrisnichols.com

dbutz@morrisnichols.com

bloughnane@morrisnichols.com

- and -

Andrew K. Glenn (admitted *pro hac vice*)

Kurt Mayr (admitted *pro hac vice*)

Shai Schmidt (admitted *pro hac vice*)

Agustina G. Berro (admitted *pro hac vice*)

Richard Ramirez (admitted *pro hac vice*)

Naznen Rahman (admitted *pro hac vice*)

**GLENN AGRE BERGMAN & FUENTES LLP**

1185 Avenue of the Americas

22nd Floor

New York, New York 10036

Telephone: (212) 970-1600

Email: aglenn@glennagre.com

kmayr@glennagre.com

sschmidt@glennagre.com

aberro@glennagre.com

rramirez@glennagre.com

nrahman@glennagre.com

*Proposed Counsel For Debtor and Debtor in Possession*